

Anuroop Packaging Limited

CIN: L25202MH1995PLC093625

REGISTERED OFFICE – 105, AMBISTE BUDRUK, POST KHANIVALI, TAULKA – WADA, PALGHAR - 421303.
CORPORATE OFFICE – 607, 6TH FLOOR, IJMIMA COMPLEX, OFF. LINK ROAD, MALAD WEST, MUMBAI – 400064.
Contact No.: 022-49240182/83 Email ID: info@anurooppackaging.com

12/04/2024

To,

BSE Limited

Phiroze Jeejeebhoy Towers,

Dalal Street, Fort, Mumbai 400 001

(ANUROOP | 542865 | INE490Z01012)

Sub.: Reporting of violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir/Madam,

This is in reference with SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 ("SEBI Circular"). The Company hereby reports violation related to its Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by one of its relative of designated persons.

Details of the violation are provided as per **Annexure-A** of the SEBI Circular and is enclosed herewith.

You are requested to take the same on record.

Thanking you.

Yours Faithfully,

**For and on behalf of
Anuroop Packaging Limited**



Akash Amarnath Sharma

Director

DIN: 06389102

Enclosed: Annexure A

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Annexure - A

Report by Anuroop Packaging LIMITED for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr No.	Particulars	Details
1.	Name of the listed company/ Intermediary/ Fiduciary	ANUROOP PACKAGING LIMITED
2.	Please tick appropriate checkbox Reporting in capacity of: - <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3.	A. Details of Designated Person (DP) i. Name of the DP ii. PAN of the DP iii. Designation of DP iv. Functional Role of DP v. Whether DP is Promoter or belongs to Promoter Group	 - - - - -
	B. If Reporting is for immediate relative of DP i. Name of the immediate relative of DP ii. PAN of the immediate relative of DP	 Mr. Yogesh Ratanlal Sharma AMXPS7286H
	C. Details of transaction(s) i. Name of the scrip ii. No of shares traded and value (Rs.) (Date- wise)	 05.04.2024 – Sold 500 Equity Shares for Rs. 11,000 at a rate of Rs. 22/- 05.04.2024 – Sold 500 Equity Shares for Rs. 11,000 at a rate of Rs. 22/- 05.04.2024 – Purchased 1000 Equity Shares for Rs. 22,500 at a rate of Rs. 22.50/-
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015. ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015.	 Not Applicable Not Applicable



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4.	Details of violations observed under Code of Conduct	Violation of during transaction during the Closure of Trading Window closure period. (Trading window was closed from April, 01, 2024 till the completion of 48 hours after declaration of the Audited Financial Results for the quarter and year ended March 31, 2024)
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Since this was an inadvertent error on part of the relative of the designated person, where such thing has happened, the Company according to its insider trading policy has given a warning to the Designated person to not exercise such practice. Further, he has also been advised to strictly comply with the Insider Trading Regulation to ensure that the same is not violated by him in future and also warned that any non-compliance would result in stringent disciplinary action.
6.	Reasons recorded in writing for taking action stated above	The Person is a part of the relative of 'Promoter Group' of the Company. Notwithstanding the above, the DP is neither involved in any of the decisions of the Company nor takes part in control of any affairs of the Company and is a DP since he is a relative of the promoters. As submitted by him, the purchase & sell of shares by him during the period of closure of Trading Window was entirely inadvertent. However, the same is a violation in terms of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and considering all aspects including his submission that he inadvertently did the transaction during the closure of Trading window and since this was the first instance of violation, we have given him a warning and strictly asked him to adhere to the rules & regulations from now.
7.	Details of the previous instances of violations, if any, since last financial year	None.
8.	If any amount collected for Code of Conduct violation(s) – Not Applicable	
i. Mode of transfer to SEBI – IPEF (Online/Demand Draft)		Not Applicable
ii. Details of transfer/payment in case of Online: N.A.		
Particulars		Details
Name of the Transferor		Not Applicable
N.A.		
Bank Name, Branch and Account		
Number		
UTR/Transaction reference Number		



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In Case of Demand Draft (DD):	
Particulars	Details
Bank and Branch	Not Applicable
N.A.	
DD Number	
DD Date	
DD Amount (in Rs.)	
9.	Any other relevant information. The transaction was an error on his part. He was trying to transact the items of some other company but instead did that of Anuroop Packaging Limited. As soon as he became aware of the fact, he bought the shares again, getting it nullified. Also, we have received the intimation of the said transaction by Mr. Yogesh Sharma by his letter dated April 08, 2024.

Yours Faithfully,



Date: 12-04-2024

Place: Mumbai

Pooja Shah

Company Secretary & Compliance Officer

PAN: DODPS3082G